

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**LEHMAN BROTHERS HOLDINGS INC., et al.,**

**Debtors.**

**Chapter 11**

**Case No. 08-13555-scc**

**[PROPOSED] ORDER TO SHOW CAUSE**

This matter having come before this Court by the *ex parte* application (the “Application”) of Stearns Lending, LLC f/k/a Stearns Lending, Inc. (“Stearns Lending”), for the entry of an order to show cause, granting a stay, and seeing a hearing on an expedited basis on Stearns Lending’s motion (“Motion”) for entry of an order pursuant to *Rule 60(b)(6)* of the *Federal Rules of Civil Procedure* seeking to vacate the “Alternative Dispute Resolution Procedures Order for Indemnification Claims of the Debtors Against Mortgage Loan Seller, Stearns Lending, LLC f/k/a Stearns Lending, Inc.,” (the “Order”) and the Court having considered the Application, and for good cause shown, it is hereby:

**ORDERED**, that the Defendants show cause before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, United States Bankruptcy Court, One Bowling Green, Room 623, New York, NY 10004-1408, on the \_\_\_\_\_ day of \_\_\_\_\_, 2015 at 10:00 a.m., or as soon thereafter as counsel can be heard, why an order should not be issued and entered vacating the Order.; and it is further

**ORDERED** that Stearns Lending’s obligation to respond to the Indemnification ADR Package within twenty-eight (28) days of its service by LBHI is hereby stayed pending the entry of a further order by this Court; and is further

**ORDERED** that service of a copy of this Order and Motion shall be made upon Wollmuth Maher & Deutsch LLP, counsel for LBHI by express overnight mail no later than \_\_\_\_\_, 2015, which service shall be deemed good and sufficient service thereof; and it is further

**ORDERED** that to the extent LBHI desires to respond to the Motion, such response must be served on Blank Rome LLP, counsel for Stearns Lending, no later than \_\_\_\_\_, 2015; and it is further

**ORDERED** that the reply papers of Stearns Lending, if any, must be served on or before \_\_\_\_\_, 2015.

Dated: New York, New York  
February \_\_, 2015

\_\_\_\_\_  
UNITED STATES BANKRUPTCY JUDGE